SECRETARY



COMMONWEALTH OF KENTUCKY

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION Division of Waste Management 7964 Kentucky Drive, Suite 8 Florence, Kentucky 41042

April 8, 1996

Mackay, Inc. 7435 Empire Drive Florence, KY 41042 Attn: John Cummings

> RE: Inspection Results Mackay, Inc. KYD-049-622-939 Boone County

Dear Mr. Cummings:

Enclosed is a copy of the report and Notice of Violation for the inspection conducted on March 28, 1996. Note there are five violations of the Kentucky Administrative Regulations. These enforcement action.

If you have questions or need further information, feel free to contact this office at the above address or call (606) 292-6411.

Sincerely,

Tay Pato)

Ray Prater Environmental Inspector III Florence Regional Office

RP:jrp

Copy: Frankfort Central Office

Florence Regional Office

Docket Number _____



COMMONWEALTH OF KENTUCKY NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

TO: Mackay, Inc.
7435 Empire Dr.
Florence Ky 41043

Florence, KY 41042 Attn: John Cummings DATE OF VIOLATION: 03/28/96

COUNTY: Boone

I.D.#: KYD-049-622-939

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of $[\mathbf{X}]$ KRS224, $[\]$ KRS151, $[\]$ KRS223, $[\]$ KRS146, $[\mathbf{X}]$ Regulation(s) $\underline{401}$ KAR Chapter 32 with applicable references in 401 KAR Chapters 30 - 40.

The extent of the violation(s) observed is as follows:

- Failure to label hazardous waste accumulation containers as required by 401 KAR 32:030 §5.
- II. Failure to keep hazardous waste accumulation containers closed except when adding or removing waste as required by 401 KAR 35:180 §4(1).
- III. Failure to maintain job descriptions of all employees involved in hazardous waste management as required by 401 KAR 35:020 §7(4).
- IV. Failure to amend contingency plan to include any updated information as required by 401 KAR 35:040 §5.
- V. Failure to conduct and record weekly inspections of the hazardous waste accumulation area as required by 401 KAR 35:180 §5.

Required action for remedial measures include, but are not limited to:

- Containers must be labeled 'hazardous waste' and dated once they become full and the waste shipped offsite prior to 90 days from that date.
- II. Containers must be kept closed except when adding or removing waste.
- III. Maintain job descriptions of all employees involved in hazardous waste management.

DIVISION OF WASTE MANAGEMENT NOTICE OF VIOLATION CONTINUATION SHEET

Page 2 of 2

Facility: Mackay, Inc.

Identification #: KYD-049-622-939

Date of NOV: 04/08/96

Date Violation Observed: 03/28/96

Remedial measures(cont'd)

IV. Amend contingency plan to include any updated information and keep a copy of plan onsite and available. Submit copies of plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called to provide emergency services. Maintain proof of submittals.

Conduct and record weekly inspections of the hazardous waste accumulation v.

All violations must be corrected no later than May 10, 1996 with a followup inspection to be conducted on or after that date. To be considered, written extension requests must be received by this office no later than five days prior to scheduled compliance date.

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalties of \$25,000 per day for each hazardous waste violation and \$5,000 per day for each solid waste violation.

To respond to this Notice of Violation, write to:

Division of Waste Management 7964 Kentucky Drive, Suite 8 Florence, Kentucky 41042 Attn: Ray Prater or call (606) 292-6411

ignatures: Title: Env. Inspector III Date: 4-8-76

ame of person or persons to whom copy was delivered:

John Cummings ____Title: Regulatory Compliance Manager

COMPLIANCE EVALUATION INSPECTION REPORT

X_ROUTINE___FOLLOW-UP___REPERMIT

1) Inspector and Author of Report

Ray Prater, Environmental Inspector III, DWM

2) Site Name and Location

Mackay, Inc. 7435 Empire Dr. Florence, KY 41042

Permit #: KYD-049-622-939

County: Boone

3) Site Mailing Address

Mackay, Inc. 7435 Empire Dr. Florence, KY 41042

4) Responsible Official

John Cummings, Regulatory Compliance Manager, Mackay

5) Inspection Participants

Ray Prater, Environmental Inspector III (KY DWM) John Cummings, Regulatory Compliance Manager, Mackay

6) Date and Time of Inspection

March 28, 1996 10:35 a.m.

7) Applicable Regulations

401 KAR Chapter 32 with applicable references in 401 KAR Chapters 30-40.

8) Purpose of Inspection

To determine compliance with above-referenced regulations.

Compliance Evaluation Inspection Report Mackay, Inc.
March 28, 1996
page 2

9) Facility Description

Mackay, Inc. is an engraving facility for the printing industry. They are a subsidiary of Bemis--a multinational corporation mainly in the packaging business--out Minneapolis/St. Paul, Minnesota. They have been in business since 1981 when they were called Gravure Systems -- No other business was located here prior to this. In 1985 they became Mackay/Gravure Systems, Inc. and in 1996 changed to their current name of Mackay, Inc. They have about 130 employees and run two to three shifts in their different operations. Printing cylinders, which originate from printing industries in Tennessee, Wisconsin, St. Louis, and other locations are engraved to customer specifications and the finished product shipped back to the customer. Following is a general description of the engraving process from the initial receipt of the cylinders to finished product.

Cylinders coming in from the customer which have a steel base are first nickel plated and then copper plated prior to engraving. If an already engraved cylinder comes in, the chrome plating is first removed and then the engraved copper plating is removed to the point that no engraved image remains and then is replated with copper. The plating process generates waste which is sent to an onsite wastewater treatment system. Any spillage in the copper/nickel or chrome plating rooms is directed to trench drains which lead to the wastewater treatment system. The resultant hazardous sludge generated in the treatment system is sent offsite for disposal and the remaining water discharged to the sewer system.

The design for each cylinder is typically generated on computer from the customer and/or at Mackay and then sent to a Helio Engraver. If artwork cannot be done on the computer, film is produced and the resultant image is scanned into the Helio Engraver. The filmmaking process results in corrosive developer waste which is sent to Dupont for silver recovery.

After the cylinder is engraved it is sent to the proofing room where four printers make test prints to check for accuracy. Whenever possible, corrections are made directly to the engraving on the cylinder. If this is not possible, the plating is removed, the cylinder replated and then reengraved. Inks for the test prints are mixed in small metal cups. After the test prints are done, excess ink from the cups is poured into a five gallon container next to the printer. The cups are then cleaned out with Methyl Ethyl Ketone and this waste added

Compliance Evaluation Inspection Report Mackay, Inc. March 28, 1996 page 3

9) Facility Description(cont'd)

to the waste ink. Periodically the containers are transferred to a 55 gallon drum in a storage room. After the cylinder is proofed, it is chrome plated and placed in a storage room prior to shipping back to the customer. Hydraulic bils from their equipment are sent to Environmental Enterprises for recycling.

10) Findings

Upon arrival at the facility, I asked to speak to John Cummings, Regulatory Compliance Manager at Mackay. I introduced myself to Mr. Cummings and informed him of the purpose of my visit. We then began the inspection with a tour of the facility.

In the Helio engraving room cylinders are engraved after first being nickel and/or copper plated - No hazardous waste is generated here. Copper, nickel and chrome wastewater sludges are placed in a container which is labeled and dated. In the proofing room were four 5-gallon containers of waste ink/Methyl Ethyl Ketone - one for each proofing press. None of the containers were 'hazardous waste' labeled and all had open funnels going into the top of the containers. The full accumulation area for this waste is located in an adjacent room. The waste drum in this room was labeled and dated but had an open funnel in it. The Graphic Arts room generates developer waste which is pumped into plastic drums in an upstairs storage area. This waste is shipped to Dupont for silver recovery. One of the drums in this area was not 'hazardous waste' labeled.

After touring the site, a records review was conducted beginning with the self inspections of the hazardous waste accumulation area. Inspections were conducted weekly up until 2-9-96 but not after this. Mr. Cummings explained that they simply got behind on their inspections. Personnel training was last conducted on 12-5-95 by the Evergreen Group. No job descriptions were available for the employees that received the training. A current hazardous waste registration is maintained onsite as well as waste analysis. A contingency plan dated 10-25-85 is maintained onsite but does not have updated information. Hazardous waste manifests and the accompanying land disposal restriction certificates are maintained and all required information is on the manifests. Annual reports and proof of submittals are maintained.

Compliance Evaluation Inspection Report Mackay, Inc.
March 28, 1996
page 4

11) Violations

- Failure to label hazardous waste accumulation containers as required by 401 KAR 32:030 §5.
- II. Failure to keep hazardous waste accumulation containers closed except when adding or removing waste as required by 401 KAR 35:180 §4(1).
- III. Failure to maintain job descriptions of all employees involved in hazardous waste management as required by 401 KAR 35:020 §7(4).
- IV. Failure to amend contingency plan to include any updated information as required by 401 KAR 35:040 §5.
- V. Failure to conduct and record weekly inspections of the hazardous waste accumulation area as required by 401 KAR 35:180 §5.

12) Remedial Measures

- Containers must be labeled 'hazardous waste' and dated once they become full and the waste shipped offsite prior to 90 days from that date.
- II. Containers must be kept closed except when adding or removing waste.
- III. Maintain job descriptions of all employees involved in hazardous waste management.
- Amend contingency plan to include any updated information and keep a copy of plan onsite and available. Submit copies of plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called to provide emergency services. Maintain proof of submittals.
- $V \cdot \$ Conduct and record weekly inspections of the hazardous waste accumulation area.

Compliance Evaluation Inspection Report Mackay, Inc.
March 28, 1996
page 5

All violations must be corrected no later than May 10, 1996 with a followup inspection to be conducted on or after that date. To be considered, written extension requests must be received by this office no later than five days prior to scheduled compliance date.

13) Attachments

Inspection Checklist Notice of Violation

14) Signatures

Ray Prater

Environmental Inspector III Florence Regional Office Division of Waste Management

Supervisor's initials

RP:jrp

Copy: Frankfort Central Office

Florence Regional Office file

PAGE 1 OF \checkmark

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET DIVISION OF WASTE MANAGEMENT GENERATOR INSPECTION REPORT

DEP 4038 (REV. 9-92)

New employees within 6 months

SITE NAME: Mack EPA ID NUMBER: KYD-049-622-939 cylinders for printin REGISTRATION EXPIRES: omany 31,1997 REGISTERED ACTIVITIES:1 Small Quantity Full Quantity Drum Accumulation Tank Accumulation Other Activities COUNTY: Boone DATE: 3-28-96 TIME: 10:449 m. ROUTINE FOLLOW-UP I. RECORDKEEPING INSPECTION ITEM CITE² C3 NC NA COMMENTS 1. Operations consistent with registration: 32:010 § 3 All generated wastes on Notification Form 32:010 § 3(4) Status correctly identified b. 32:010 § 3(4) C. Notification form data correct 32:010 § 3(4) d. Up to date registration 32:010 § 3(1) 2. Hazardous waste determination/analysis record 32:010 § 2 3. Generator annual report submitted/maintained: 32:040 § 1: 2 Correct information submitted 32:040 § 2(1) b. Copy sent to County Judge/Executive 32:040 § 2(3) Last 3 years on file 32:040 § 1(2) Inspection requirements: 32:030 §5(1)(d) Adequate schedule developed/kept: 35:020 §6(1;2) 1) Container accumulation areas weekly: 35:180 § 5 inspection a) Check for leaks 35:180 § 5 b) Address container condition 35:180 § 5 b. Inspection log details: 35:020 § 6(4) 1) Date of inspection 35:020 § 6(4) 2) Time of inspection 35:020 § 6(4) 3) Inspector's name 35:020 § 6(4) 4) Notation of observations 35:020 § 6(4) 5) Date & nature of remedial actions 35:020 § 6(4) Records maintained at least 3 years 35:020 § 6(4) Inspections conducted and recorded 35:020 § 6(2;4) Remedial actions taken 35:020 § 6(3) Personnel training requirements: 32:030 §5(1)(d) Adequate training program developed 35:020 § 7(1) Training conducted by qualified person 35:020 § 7(1) Appropriate/required employees trained 35:020 § 7(2)

35:020 § 7(2)

[&]quot;Y" means the activity is listed on the Certification of Registration while a "N" means the activity is not listed on the Certification of Registration.

Il regulatory cites are from Title 401 of the Kentucky Administrative Regulations. The number preceding the colon is the Chapter reference. The number appearing he colon is the regulation number. The symbol § is a reference to the section. For example, the reference to "35:020 § 6 should be read as "Section 6 of 401 KAR".

These cites are not comprehensive and other regulatory sections may be applicable.

the abbreviation, "C" means compliance with the requirement; "NC" means non-compliance with the requirement; "NA"means the requirement is not applicable at the function; "P" means a decision on compliance is pending; and "R" means a violation has been consecutively reneated

PAGE 2 OF 4 DEP 4038 (REV. 9-92)

GENERATOR INSPECTION REPORT

I. RECORDKEEPING INSPECTION ITEM	CITE ²		C³	NG	I I			DATE: 3 - 28 - 96
e. Annual retraining	35:020 § 7(3	,		NC	NA	P	R	COMMENTS
f. Required personnel records:	35:020 § 7(4		X.					
1) Name and job title	35:020 § 7(4		_	$\langle X \rangle$				Nojob
2) Detailed, written job description (duties)	35:020 § 7(4			X				descriptions on
3) Written skill, education & qualifications	35:020 § 7(4		-	X	-	-	_	descriptions on trained employee
4) Training given to & completed by data	35:020 § 7(4)		\rightarrow	X	\dashv	4		
g. All training records maintained on-site	35:020 § 7(5)			+	-	-	_	~
6. Contingency Plan & emergency requirements:	32:030 §5(1)		4	-	-	_		
a. Response actions described as required:	35:040 § 3(1)		4	-	_		1	4
1) 35:040 § 2 - Implementation	35:040 § 3(1)		4	-	_	4	_	
2) 35:040 § 7 - Emergency procedures	35:040 § 3(1)		1	-	_	_		
b. SPCCP, etc. amended for 35:040 provisions	35:040 § 3(1) 35:040 § 3(2)	_	+	_		_		-
c. Arrangements described	35:040 § 3(2)	- 1	1	+		\perp	_	
d. Emergency coordinator information	35:040 § 3(3) 35:040 § 3(4)	-	4	-	-	_		
e. List of emergency equipment		$+\times$	_	4				- 1
f. Copy of contingency plan on-site	35:040 § 3(5)	X	7	-		_	\perp	
g. Distribution of contingency plan	35:040 § 4(1)	K	+	_				
h. Amendment of contingency plan	35:040 § 4(2)	X	+	\downarrow		\perp	1	
i. Coordinators' knowledge and authority:	35:040 § 5	-	u	4	_	\perp	P	lan needs updating
1) Operations assert 0	35:040 § 6 35:040 § 6	1	+	-		_	\perp	7 - 1.9
2) Authority to an in	35:040 § 6	X	-	-				
Notification of 1	35:040 § 6 35:040 § 7(4)	X	-	_		_		
1) Local fire & 1:	35:040 § 7(4)	X	-	-	_			
2) Local/state/fect 1 ED	35:040 § 7(4)	1	-			_	1	
Implementation D	35:040 § 7(4) 35:040 § 2; 7	X		+-	_	_		746
1) Time data & data :	35:040 § 7	X	_	+	_	_		
2) Submitted within 15 days	35:040 § 7	X		-				
) Implementation D	5.0	X		-				
Arrangements with the	5:040 § 7(4)	X		_				
Police/fire/hand trans	2:030 §5(1)(d)	X		_				
Refugals :	5:030 § 7(1;2)							
International ship	5:030 § 7(1;2)							
Generator manife	2:050 § 1 - 9			X				
Required information 3.	2:020; 32:100	X						
Manifest promote	2:100	X		1				
Manifest maintained	2:020 § 3; 4	X						
Exception report sub-size to	2:040 § 1	X						dr
and disposal restricted	::040 § 3; 1	X	_					
Determination / I i	napter 37	X						
Dilution prohibited in lieu of treatment 37	:010 § 7	X						

SITE NAME: Mackay, Inc.	DATE: 3-28-96									
I. RECORDKEEPING INSPECTION ITE	M CITE ²		C³	INC	NA	P	T n			
c. Notice/certification with each shipment:	37:010 § 7	-	<u>_</u>	INC	INA	P	R	COMMENTS		
All required information	37:010 § 7		\leq	-	-		-			
2) Correct treatment standard	37:010 § 7	\dashv	S		-		-			
3) Waste analysis sent, if available	37:010 § 7	-+	$\stackrel{\frown}{>}$				_			
II. PHYSICAL INSPECTION ITEM	CITE ²	+	C ₃	NC	NA	P	R	2010		
Satellite accumulation areas:	32:030 § 5(3)	_		NC	IVA	1	K	COMMENTS		
a. Maximum of 55 gallons	32:030 § 5(3)	_		-						
b. 1 quart maximum if acutely hazardous	32:030 § 5(3)		<u> </u>	-	-					
c. At or near generation point	32:030 § 5(3)		\exists		-	\dashv	_			
d. Operator's control	32:030 § 5(3)		-	-	-	-				
e. Complies with 35:180 § 2; 3; 4(1):	32:030 § 3(3)		-		-	-				
1) Condition of containers	35:180 § 2	<u>"</u> {	1	_	\dashv	\dashv	-			
2) Compatibility of waste with containers	35:180 § 3	+	+		-	+	\dashv			
3) Closed except for adding/removing	35:180 § 4(1)	+	-		+	+	-			
f. "Hazardous Waste" marking		1	+	1	-	+	_	Containers not labeled		
2. Prevention and preparedness:	32:030§5(3)(a) 32:030 §5(1)(d	_	- /	1	+	-	-	and not closed		
a. Maintained/operated to prevent releases	35:030 § 3(1)(d	-	_	+	-	+		a (a)		
b. Required equipment:	35:030 § 2	12		_	-	-	\dashv			
All Contingency Plan equipment	35:040 § 3(5)	X	+	+	+	+	-			
2) Internal communication or alarm system	35:030 § 3(1)	X	+	+	+	+	+			
3) Telephone or 2-way radio	35:030 § 3(2)	R	-	+	-	+	+			
4) Fire extinguishers, if applicable	35:030 § 3(3)	1	-	+	-	+	-			
5) Absorbent material, if applicable	35:030 § 3	12		+	-	+	-	*		
c. Required equipment maintained/operated	35:030 § 4	12	-	+	+	+	\dashv			
d. Access to communications or alarm	35:030 § 5	X	-	+	+	+	+			
e. Adequate aisle space maintained	35:030 § 6	X	\vdash	-		+	+			
3. Accumulation in containers:	32:030 § 5(1)(a)	-	\vdash	+	+-	+	+			
a. D.O.T. packaging	32:030 § 3(1)(a)	1	-	+	-	+	+			
b. Accumulation start date:	32:030 §5(1)(b)	X	-	+	+-	+	+			
1) Date clearly marked	32:030 §5(1)(b)			+	+-	+	-			
2) Date visible for inspection	32:030 §5(1)(b)	0	-	+	+-	+-	+			
c. Each clearly marked "Hazardous Waste"	32:030 §5(1)(c)		2	-	+	-	+			
d. Condition of containers	35:180 § 2	1	()		-		Ψ	rum not labeled		
e. Compatibility of waste with containers	35:180 § 3	X		-	-	-	+			
f. Management of containers:	35:180 § 4	2		-	+	-	+			
1) Drums closed (except adding/removing)	35:180 § 4(1)		V	-	+-	+-	10	4 / 1		
2) Operated to prevent leaks or ruptures	35:180 § 4(2)	X	1	1		-	U	rum not closed		
g. Ignitable or reactive waste management:	35:180 § 6	2			-	-	-			
1) 50 feet from property line		$\frac{2}{x}$					-			
h. Incompatible waste management	35:180 § 7	X					+			

STENAME: Mackay, Inc.

DATE: 3-28-96

1 500	PHYSICAL INSPECTION ITEM		CITE ²	C,	NC	NA	P	R	COMMENTS .
4. FQG accumulation period of 90 days	of 90 days		030 § 5(1)	X	1				COMMENTS .
5. SQG accumulation period of:		32:	030 § 6(1)			X			1.
a. 180 days or		32:0	030 § 6(1)			X			
b. 270 days (if > 200 miles and < 6,0	6,000 kg)		030 § 6(1)			X			
III. GENERAL INFORMATION	YES	NO	N/A					CO	OMMENTS
1. Photographs taken?	X							CO	MUMENTS
2. Samples collected?		X							
3. Previous non-compliances corrected?								\ <u></u>	
4. Attached Reports:			5	A)					
a. Tanks									
b. Hazardous Waste Fuel Marketer			2						
c. Hazardous Waste Fuel Burner									
COMMENTS INCLUDING REMEDI	AT ME	A CYTO							
inspection to be cond written requests for no later than five of	lucted ran	d o	n or ension	9 Ft - MU	Ma	th.	o, i	199 dat ce; u	e. To be considere
inspection to be cond written requests for no later than five o	lucted ran days	ext p	cted nor ension	by and	Ma	the be	0 / 1 ne.	199 dat ce;	6 with a follow-up e. To be considere red by this offic date.
inspection to be cond written requests for no later than five o	ucted man	d o ext	cted nor ension	by and	May	the be	941	199 dat ce; c	6 with a follow-up e. To be considere red by this offic date.
ECTOR'S SIGNATURE 2 ay 7 Dy acknowledge a copy of this report and following this inspection.	lays rate	ext p	ensi o	Un TITI	com E S	nov.	ne.	d qt ce;i	inspection

FY 95 HAZARDOUS WASTE COMPLIANCE AND ENFORCEMENT LOG								
1. ID Number K Y D	00 4 9 6 2 2 9 3 9 1	2. Facility Type: TRANSPORTER GEN MKTR HW UO MKTR BURNER SPEC OIL FUEL MKTR DNON-HANDLER	TOG SOG HW BURNER NON-NOTIFIER COMBUSTION					
4. Handler Name Mackay, Inc.								
5. Location Address_	7435 Empire D	ry Florence	KY 410 42					
6. Evaluation	Add Change	Delete	*					
Date of Evaluation	Sequence Number Agency Ty		Responsible eason Person	Branch				
03/28/96 MM/DD/YY	<u>\$</u>	CEI	_ RPR	FL				
	Areas of Evaluation (E-Evalua	ated, NE-Not Evaluated,	NA-Not Applicable)					
GGR GRR GMR GLB GPT GTR GMW GLO GGOR TGR	TMR DFR TWD DMC DGS DTR DCP DIA DPP DPS DRR DOP DMR BPS DLB BIS DPB BCE DCL BDT	DGW DSI DWF DLF DLT	W HWM HWB UOB UOM SFM REC CAS CSS					
Comments								
7. Violation	Add Change	On-going Violation	Delete					
Agency Seque	Area of Violation G P T	Class of Violation	Regulation Citation $32:0305(3a2)$	Regulation Type <u>S</u> <u>R</u>				
Priority 7 Comments Accum	Date Determined 03,28,96 MM/DD/YY ulation containers	Scheduled Date O 5,10,96 MM/DD/YY	/ / MM/DD	,				
		<u> </u>						
	nce Number Area of Violation	On-going Violation Class of Violation (Regulation Citation	Regulation Type				
Priority	Date Determined 03 128196 MM/DD/YY	Scheduled Date Scheduled Date MM/DD/YY						
Comments Contgin	ers not closed	(A)		- A				

EVALUA	TION-VIOLATION-E	NFORCEMENT FO	ORM II/CONTINUAT	10.10			
1a. ID Numbe	r KIYIDIO141	71612121913	191	10N)		PAGE 2 OF	2 12/94
7b. Violation	Add	Change	On-going Violation	TT			
Agency	Sequence Number	Area of Violation	Class of Violation		Delete	HO 195	
<u>\$</u>		GRR	2 1 RP	35: a	egulation Cir 2057	(4)	Regulation Type <u>S</u> R
Priority	Date Dete	ermined	6.1	Return	to Complian	ce	
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Comments_No	sob desc	riptions	<u>Ø5, (0</u> MM/DD/	<u>770</u> YY		/ _{DI}	D/YY
7c. Violation	Add	Change	On-going Violation	ТТ	D. I.		
Agency	Sequence Number	Area of Violation	Class of Violation		Delete		
<u>s</u>		GPT	(Z)	35:	oyo S	ation 5	Regulation Type
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CommentsC_0	ntingency	plan not	amended				
7d. Violation	Add	Change	On-going Violation		Delete	1	
Agency	Sequence Number	Area of Violation	Class of Violation		Delete		
<u>s</u>		GPI	1 2 77	35;	ulation Cita 1805	5	Regulation Type 5 R
Priority	Date Deter	mined	0	Return	to Complia	nce	
7	03/28/ MM/DDA		Scheduled			Actual Res	olve Date
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Comments_/\CC	umulation a	reas not u	eekly				95
8. Enforcement	Add	Change	Delete	T			
Date Determined	Sequence Numbe	Agency	Type of Enforceme	nt	Branch		
03,28,96 MM/DD/YY		<u>s</u>	190		Branch F L	F	Responsible Person
Comments			<u> </u>		<u></u>		$\overline{\mathcal{L}}$
comments							
8a. Enforcement	Add	Change	Delete				
Date Determined	Sequence Number	Agency	Type of Enforcem	ent	Branch	, ,	Responsible Person
// //		<u>_</u> S_			Didiici	9 . 	responsible reison
	ssed					•	
Comments			Se	ttled			
	ns (Enter violations ac		onformer	•			
Sequence #	Area of Violation	Sequence #	Area of Violat		Sequence	,	
1			Silver of Violat		sequence	"	Area of Violation
						-	
7.0							William Control of the Control of th



